

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re: Suhail Iqbal

)

Case No: 23-30580

)

Chapter 13

OBJECTION TO CONFIRMATION

COMES NOW, Susan H. Call, Counsel for Carl M. Bates the Chapter 13 Trustee, and moves this Court to deny confirmation of the Chapter 13 Plan filed on February 21, 2023, for the cause as follows:

1. The Debtors filed this Chapter 13 Petition on February 21, 2023 under 11 U.S.C. Chapter 13, now pending in the United States Bankruptcy Court, Eastern District of Virginia, Richmond Division.
2. This Objection is filed pursuant to 11 U.S.C. 1325.
3. The above filed Chapter 13 Plan fails to pay the equivalent distribution to unsecured creditors that they would receive under the Chapter 7 liquidation analysis, and income requirements shown by:
 - a. The debtor owns real estate with substantial equity, based on the comparative market analysis of the real estate provided by the debtor, he values it too low on Schedule A, and therefore is not meeting liquidation requirements.
 - b. The trustee also requests six months of all bank statements from all bank accounts.
 - c. The trustee requests the paystub for December 28, 2022 and August 5, 2022 for the non-filing spouse to have the six months of stubs.
 - d. The trustee suggests all income and liquidation requirements be met.

WHEREFORE, for the reasons stated herein, the Chapter 13 Trustee, by Counsel, Susan H. Call, respectfully moves the Court to deny confirmation of the Debtors' proposed Chapter 13 Plan as filed with the Court, and for such further and other relief as in the premises may seem just.

Date: April 11, 2023

/s/Susan H. Call

Susan H. Call, Counsel for
Carl M. Bates, Chapter 13 Trustee

Certificate of Service

I hereby certify that on April 11, 2023, I have mailed or hand-delivered a true copy of the foregoing Objection to Confirmation to the debtor(s), Suhail Iqbal, 1301 Idlewild Blvd, Fredericksburg, VA 22401 and electronically sent to debtor's attorney, Michael Jacob Owen Sandler, Esquire, ecf@bolemanlaw.com.

/s/Susan H. Call
Susan H. Call, Counsel for
Carl M. Bates
Chapter 13 Trustee

**UNITED STATES BANKRUPTCY COURT
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Chapter 13

Debtor Address 1301 Idlewild Blvd
Fredericksburg, VA 22401

Last four digits of Social Security No(s): 7187

NOTICE OF OBJECTION TO CONFIRMATION

Susan H. Call, Counsel for Carl M. Bates the Chapter 13 Trustee, has filed papers with the Court objecting to confirmation of your Chapter 13 Plan, which was filed in this case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

If you do not want the court to grant the relief sought in the objection, or if you want the court to consider your views on the objection, then on or before three (3) days before the date of the hearing, you or your attorney must:

 X File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
701 East Broad Street, Suite 4000
Richmond, VA 23219

You must also mail a copy to:

Susan H. Call, Counsel for
Carl M. Bates
Chapter 13 Trustee
P.O. Box 1819
Richmond, VA 23218

 Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**

Susan H. Call, Esquire
Staff Counsel for
Carl M. Bates, Chapter 13 Trustee
P.O. Box 1819
Richmond, VA 23218-1819
(804) 237-6800
VSBN 34367

X Attend the hearing on the objection scheduled to be held on **April 19, 2023** at **9:05 am** at United States Bankruptcy Court.

REMOTE HEARING INFORMATION:

This hearing will take place remotely through Zoom on the date and time scheduled herein.

To appear at the hearing, you must send, by email, a completed request form (the "Zoom Request Form"), which is available on the Court's internet website at www.vaeb.uscourts.gov, on the page titled, "Temporary Emergency Provisions Regarding ZoomGov Remote Proceeding Access Information." Email your completed Zoom Request Form to the email address listed for the Judge assigned to the case. Following receipt of your Zoom Request Form, Court staff will respond to the email address from which the request was submitted with additional information on how to participate through Zoom.

The email address shall be used only to submit Zoom Request Forms. No other matters or requests will be considered by Court staff, and under no circumstances will any such matters or requests be brought to the Judge's attention. Failure to comply with these instructions may result in appropriate action, including but not limited to the imposition of sanctions.

PLEASE NOTE: You MUST submit the Zoom Request Form no later than two (2) business days prior to this hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the objection and may enter an order granting that relief.

Date: April 11, 2023

/s/Susan H. Call
Susan H. Call, Counsel for
Carl M. Bates
Chapter 13 Trustee
P.O. Box 1819
Richmond, VA 23218-1819
VSBN 34367

Certificate of Service

I hereby certify that on April 11, 2023, I have mailed or hand-delivered a true copy of the foregoing Notice of Objection to Confirmation to the debtor(s), Suhail Iqbal, 1301 Idlewild Blvd, Fredericksburg, VA 22401 and electronically sent to debtor's attorney, Michael Jacob Owen Sandler, Esquire, ecf@bolemanlaw.com.

/s/Susan H. Call
Susan H. Call, Counsel for
Carl M. Bates, Chapter 13 Trustee

Susan H. Call, Esquire
Staff Counsel for
Carl M. Bates, Chapter 13 Trustee
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